

Exhibit A



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VIA EMAIL

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Counsel:

Pursuant to the Court's October 2, 2023 Minute Order and Arab Bank, PLC's ("Arab Bank" or the "Bank") letter dated October 16, 2023, the Bank is providing the Plaintiffs with information about "the electronic sources of communication (including financial transactions) which were later printed and preserved in the regular course of business in paper format."

As a preliminary note, the information Plaintiffs have requested is over 20 years old and, during the relevant time period of January 1, 1998 to December 31, 2004 (the "Relevant Time Period"), the technology used, particularly in the Palestinian Territories, was extremely archaic. The Palestinian Territories had intermittent electricity, let alone internet connectivity.

1. **Microfiche**. In the mid-2000s, Arab Bank Palestine began to implement the Microfilm/Microfiche Archiving Project (the "Microfiche Project"). Due to the military activities and demonstrations during the Second Intifada, the Microfiche Project was put on hold until 2005. Only a limited number of transactions were archived using the Microfiche Project.
2. **Email**. Email was used intermittently during the Relevant Time Period and was not used as a form of official communication. In the Palestinian Territories, the communication lines were very primitive. There was not a centralized email system.
3. **SWIFT**. The SWIFT banking system was used in parallel with test keys fax-based transfers, where transfers were keyed in an internally developed system for incoming and outgoing funds transfers. This Cobol programming language-based system was internally developed and implemented in a decentralized environment.



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4. **Equation**. Arab Bank used a Centralized Online Real-time Environment (“CORE”) banking system called Equation acquired from Finastra (previously MISYS). Equation was implemented on an IBM mainframe at the Bank’s headquarters in Ramallah and was linked to mini servers at each of the Bank’s branches. The branch mini server was linked with dummy terminals used by the Bank’s employees for transaction processing.
5. **Teller**. Teller, an internally developed Cobol-based programming language system, was deployed in a decentralized environment on each branch mini server.

Due to the poor and primitive communications lines, the linkage between the Equation Mainframe and the branches mini servers was not automated, and as such the Bank updated the Equation Mainframe at the end of day and the mini servers located in the branches at the beginning of every day using floppy discs.

The transactions details, whether processed through Teller or the incoming/outgoing transfer systems, or other internally developed systems, are the same information that appears on a customer’s bank statements.

The information set forth in this letter is based on a reasonably diligent search of the Bank’s records and conversations with the Bank. If we discover additional electronic sources of communications (including financial transactions) which were later printed and preserved in the regular course of business in paper format, then we will supplement this letter accordingly. We are available to discuss further on our meet and confer scheduled for November 2, 2023.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B Ingerman'.

Brett Ingerman